# COMPREHENSIVE PLAN AMENDMENT

# AMENDED AMENDMENT 2006-T-05 – LAND USE ELEMENT UPDATE RESIDENTIAL POLICIES UPDATED FOR REVIEW IN 2007 PUBLIC HEARING FINAL ISSUE PAPER – (REVISED JUNE 29, 2007)

# **DESCRIPTION:**

Policy text amendments are proposed to provide a density exception and mapping policy for existing manufactured home parks in the City's lowest density residential designation, Residential Low Density (RLD). This is a citywide amendment but the change in policy would apply primarily in the Potential Annexation Area (PAA). Policy direction is already established for the manufactured home parks within the existing city limits.

# **ISSUE SUMMARY:**

Should the City support preservation of the manufactured home parks in the Residential Low Density land use designation?

# **RECOMMENDATION SUMMARY:**

Approve a text amendment to the Residential Low Density designation to allow Residential Manufactured Home Park (RMH) zoning to be applied as an implementing zoning.

### **BACKGROUND:**

Amendment 2006-T-05 was initiated last year in response to residents of the Wonderland Estates Mobile Home Park. This amendment would change the Comprehensive Plan text to allow RMH zoning to be an implementing zone within the RLD Comprehensive Plan designation. This change allows the City Council to consider RMH zoning as an implementing zone within the RLD designation for existing affordable mobile home parks without amending the Comprehensive Plan land use map by changing land use designations.

At that time, Wonderland Estates was included in the expanded Maplewood Addition Annexation and was listed for sale. Residents of the park requested that the City provide assistance in preserving it through zoning to RMH. The context of this amendment review changed significantly over the course of the year.

- The annexation was modified as a result of the Supreme Court decision in Rose Hill nullifying the Boundary Review Board decision to expand the Maplewood Addition Annexation.
- Annexation of Maplewood Addition proceeded without Wonderland Estates.
- The property owner of Wonderland Estates appealed the text amendment 2006-T-05 SEPA review, causing the Comprehensive Plan Text Amendment to be put on hold by the City. That appeal is now resolved so the text amendment can now proceed through the review process.
- The property owner of Wonderland Estates applied for and vested a plat for 100 townhouse type units under King County zoning.

- The City initiated a broader land use review of the Maple Valley Corridor that is currently before the Planning Commission as Comprehensive Plan Amendment 2007-M-03. The Wonderland Estates site is recommended for Residential Medium Density (RMD) land use with RMH zoning as part of CPA 2007-M-03.
- A new 10% petition annexation, the New Life-Aqua Barn Annexation is being processed and this petition includes the three parks in the Maple Valley Corridor. This petition is going to the City Council for review on June 4, 2007.
- The Aster Park annexation was proposed and is going to City Council June 18, 2007. This annexation includes Fir Grove Park.

### **ANALYSIS:**

RMH zoning is currently an implementing zone in two Comprehensive Plan designations: Residential Single Family (RS) and Residential Medium Density (RMD). Adding RMH as an implementing zone in a third land use designation, RLD, will allow the City to apply this zoning in the RLD areas without doing a Comprehensive Plan map amendment. As a result, the allowed density remains a maximum of four dwelling units per net acre. In the past, City policy has assigned higher density land use to sites with existing mobile home parks. This policy creates an incentive for redevelopment of the parks because higher density can be achieved with townhouse and multi-family unit types.

There are several existing parks located in RLD designated areas.

- There are three parks in the Maple Valley Corridor:
  - Wonderland Estates Mobile Home Park (113 units): proposed for amendment to RMD with RMH zoning
  - Condo Mobile Home Park (95 units): located farther to the east within the New Life-Aqua Barn annexation area and is proposed for RMD with RMH zoning
  - o Valley View Mobile Home Park (50 units): proposed for RLD with R-4 zoning
- The Fir Grove Park (32 units): located on Highway 900 adjacent to 148<sup>th</sup> St. and is designated Low Density Residential
- There are four manufactured home parks in the West Hill PAA:
  - o Located on Rainier Blvd (52 units): designated RMD
  - Three parks are located on Sunset Blvd and are designated RMD. There are an estimated 132 units in these three parks

The Wonderland Estates, Valley View, and Fir Grove Parks are older facilities with a mix of singlewide and doublewide units. Most of those units are not movable and many do not meet current certification and code requirements. These parks are developed on an internal private access loop road with private yards and lot areas. Residents have the opportunity to maintain small yards and have off street parking with either one or two (tandem) spaces available in the side yard.

These parks typically include a community room and/or facilities. They offer affordable owner occupied forms of housing. Some are age restricted to occupants age 55 and older. All of these parks currently have higher density zoning in King County. The Condo Mobile

Home Park in the Maple Valley Corridor offers residents the opportunity to purchase a condominium ownership.

**Summary of Existing Parks' Density and Zoning in King County** 

Park	<b>King County Zoning</b>	<b>Existing Density</b>
Wonderland Estates	R-12	11.5 du/net ac
Condo Mobile Home Park	R-12	4.1 du /ac
Valley View	R-12	5.3 du /ac
Fir Grove	R-48	6.66 du/ac

### **COMPREHENSIVE PLAN COMPLIANCE:**

The Comprehensive Plan text amendment meets required finding #1 Title IV 4-9-020 "the request supports the vision embodied in the Comprehensive Plan" by supporting the vision of a transition between rural and urban uses and by supporting affordable housing.

The existing manufactured home parks in Renton's PAA are located at the edge of the City in portions of the PAA with lower land costs. These areas abut the Rural Designation. In all cases where the City has designated RLD land use, the areas provide a transition to the rural area. This condition is present along the Maple Valley Highway where the Rural Designation is adjacent to the roadway. It is also present at the Fir Grove property now developed with a manufactured home park along Sunset Blvd adjacent to 148th Street. The RLD policies provide for a transition of uses and densities to the rural area. Manufactured home parks are generally denser than other uses in the RLD designation because they are very small living units occurring in a private park configuration. However, they are also a smaller, nonsuburban land use that does provide a type of transition to the rural area. Although they have density like multi-family uses, they really are not comparable to multi-family living environments. The units are typical of the older affordable single-family housing often found in these areas. Individual manufactured homes located on acreage are also frequently located in rural areas. These parks do comply with the Objective LU-DD of the RLD policies in that they provide for a range of lifestyles adjacent to both urban and rural development in areas providing a transition to the rural designations.

The lifestyle in this case is a compact community providing affordable housing to individuals who want a small single family detached type of unit in a location adjacent to open space and rural forms of development.

**Objective LU-DD**: Provide for a range of lifestyles and appropriate uses adjacent to and compatible with urban development in areas of the City and Potential Annexation Area constrained by extensive natural features, proving urban separators, and/or providing a transition to rural Designations within King County.

The proposed amendment to the purpose statement of the RLD would acknowledge the role these existing parks have in making a transition to the rural area.

"Lands developed with existing manufactured home parks that provide a transition to adjacent Rural Areas and/or are adjacent to critical areas but were established uses in King County prior to annexation may be considered for Residential Manufactured Home Park zoning."

The proposed policy amendment to LU-134 is intended to exempt these parks from the low-density limit.

Policy LU-134a A density exception to the 4 dwelling unit per acre maximum is allowed for pre-existing manufactured home parks within the Residential Low Density designation. Upon cessation of the manufactured home park use, these properties should be considered for Residential 4 zoning.

The Housing Element also provides policy guidance for low-income housing and for manufactured home parks (the underlined text shown below highlights relevant sections of these policies). The existing parks within the PAA are viable low-income housing for existing residents. If protected through zoning, these units can be maintained and as a result, long term housing opportunities will be expanded (Objective H-E). The parks provide a form of ownership (H-29) and a form of single-family housing. Due to limitations on expansion or redevelopment of parks protected by zoning, preservation of these parks will implement preservation and long-term affordability goals (H-28, H-29, H-33). The location of these parks adjacent to the rural area meets policies for dispersion (H-29).

# **Low Income Housing Policies**

**Objective H-E:** <u>Increase housing opportunities for low</u> and very low-income Renton residents and provide a fair share of low-income housing in the future.

**Policy H-28.** Establish the following sub-targets for affordability to households earning 50 percent or less of county median income, to be counted toward the 20 percent target:

- 1. Ten percent of new housing units constructed in the City.
- 2. A number equal to five percent of new housing units, to be met by existing units that are given long-term affordability.
- 3. A number equal to five percent of new housing units, to be met by existing units that are purchased by low-income households through home-buyer assistance programs.

**Policy H-29.** Support proposals for low-income housing for households earning less than 60 percent of area median income based on the following criteria:

- 1. Dispersion of low-income housing throughout the City.
- 2. Convenient access to transit for low-income households.
- 3. A range of unit types including family housing.

- 4. Ownership housing when possible.
- 5. <u>Long-term affordability</u>.
- **Policy H-33.** Encourage preservation, maintenance, and improvements to existing subsidized housing and to market-rate housing that is affordable to low and moderate-income households

Objective H-H: Continue to allow manufactured home parks and manufactured home subdivisions on land that is specifically zoned for these uses.

**Policy H-45.** Maintain existing manufactured housing developments that meet the following criteria:

- 1. The development provides market rate housing alternatives for moderate and low-income households.
- 2. The housing is maintained and certified as built to the International Building Code and Federal Department of Housing and Urban Development standards.
- 3. Site planning includes pedestrian amenities, landscaping, and a community facility.

# **ZONING CONCURRENCY:**

Consideration of RMH zoning within the RLD designation would occur as a separate zoning action upon annexation, or as a separate rezoning. However, as this proposed amendment is a new policy, none of the sites to be considered will have been considered for this form of zoning in a prior area-wide land use analysis. This situation will facilitate the required finding for rezoning under Title IV 4-9-190.

This amendment also requires zoning text amendments to Title IV Section 4-2-020F Purpose of the Residential Manufactured Home Park Zone, and to 4-2-110D adding the Residential Manufactured Home Park to the chart specifying how zoning classifications implement the Comprehensive Plan. These amendments are housekeeping changes needed to implement the new policy.

# **CAPACITY ANALYSIS:**

This amendment does not change land use capacity.

### **CONCLUSION:**

Amending the Comprehensive Plan text to expand the City's ability to protect existing manufactured home parks within the RLD designation supports a number of adopted policies and objectives of the City. The proposed policy change will allow the City to consider zoning for the existing parks that will allow their continued maintenance and operation.